UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

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Huzhou Chuangtai Rongyuan Investment Management Partnership, Huzhou Huihengying Equity Investment Partnership, and Huzhou Huirongsheng Equity Investment Partnership,		:	
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		:	
	Petitioners,	:	Case No.:
		:	
V.		•	
Hui Qin,		•	
	Respondent.	•	
		•	
		•	
		v	

DECLARATION OF CAROL LEE IN SUPPORT OF PETITION TO CONFIRM AND ENFORCE FOREIGN ARBITRAL AWARD AND FOR ENTRY OF JUDGMENT

I, Carol Lee, declare as follows:

- 1. I am an attorney at Pillsbury Winthrop Shaw Pittman LLP ("Pillsbury"). Pillsbury represents Petitioners Huzhou Chuangtai Rongyuan Investment Management Partnership ("Chuangtai Rongyuan"), Huzhou Huihengying Equity Investment Partnership ("Huihengying"), and Huzhou Huirongsheng Equity Investment Partnership ("Huirongsheng") in the above-captioned action.
 - 2. I am licensed and in good standing to practice law in the State of New York.
- 3. I submit this declaration in support of Petitioners' Petition to Confirm and Enforce Foreign Arbitral Award and For Entry of Judgment.
- 4. Attached hereto as **Exhibit A** is a true and correct copy of the foreign arbitral award, dated April 22, 2021 (the "Award"), issued by the Arbitration Panel in the proceeding before the China International Economic and Trade Arbitration Commission.

- 5. Attached hereto as **Exhibit B** is a certified translation of the Award.
- 6. Attached hereto as **Exhibit** C is the Capital Increase Agreement, dated March 15, 2017, entered by and between Shenzhen SMI Shengdian Culture Media Group Co., Ltd. ("SMI Shengdian"), SMI International Cinema Co., Ltd. ("SMI International"), Chengdu Runyun Culture Communication Co., Ltd. ("Run Yun") and Chuangtai Rongyuan (the "Chuangtai Rongyuan Capital Increase Agreement").
- 7. Attached hereto as **Exhibit D** is a certified translation of the Chuangtai Rongyuan Capital Increase Agreement.
- 8. Attached hereto as **Exhibit E** is the Capital Increase Agreement, dated March 15, 2017, entered by and between SMI Shengdian, SMI International, Run Yun and Huihengying (the "Huihengying Capital Increase Agreement").
- 9. Attached hereto as **Exhibit F** is a certified translation of the Huihengying Capital Increase Agreement.
- 10. Attached hereto as **Exhibit G** is the Capital Increase Agreement, dated March 15, 2017, entered by and between SMI Shengdian, SMI International, Run Yun and Huirongsheng (the "Huirongsheng Capital Increase Agreement").
- 11. Attached hereto as **Exhibit H** is a certified translation of the Huirongsheng Capital Increase Agreement.
- 12. Attached hereto as **Exhibit I** is the Supplemental Agreement to the Capital Increase Agreement, dated March 15, 2017, entered by and among Petitioners and SMI Shengdian and Qin ("Supplemental Agreement").
 - 13. Attached hereto as **Exhibit J** is a certified translation of the Supplemental Agreement.

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I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed on: November 8, 2021

CAROL LEE